

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA

v.

GREGORY COLBURN et al.,

Defendants.

No. 1:19-cr-10080-NMG

**DEFENDANT JOHN WILSON'S MOTION FOR LEAVE TO FILE
REPLY IN SUPPORT OF HIS MOTION FOR LEAVE TO FILE EX
PARTE AND UNDER SEAL**

Defendant John Wilson hereby moves the Court to allow him to file a nine-page reply brief in support of his request, in docket entry 1437, to file a memorandum and two affidavits under seal and, in part, ex parte. The following paragraphs describe the reasons supporting leave to file a reply.

Wilson filed a formal motion for suppression and other remedies to counteract improper actions through which the government obtained and executed a warrant to search Wilson's email server (docket entry 1437). This motion was a single document consisting of 2.5 pages of narrative that explained the relief requested, but did not contain any legal analysis or supporting evidence. As part of the motion, Wilson made a preliminary request for leave to file a supporting memorandum of law and two affidavits under seal and, in part, ex parte. In pre-motion correspondence, the government "reserved its rights," but otherwise took no position.

After Wilson filed his formal 2.5-page motion, and was awaiting the Court's ruling on how to file the supporting memorandum of law and factual affidavits, the government filed a seven-page opposition (docket entry 1447) that sets forth new positions and arguments. The government now objects to any impounded filings; furthermore, it asks the Court to take the

Motion allowed. SMC Boston, USDI 9/15/20